

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF PROPOSED AGENDA OF MATTERS SCHEDULED
FOR CONFIRMATION HEARING ON DECEMBER 13, 2021 AT 9:00 A.M.**

Time and Date of Hearing: Monday, December 13, 2021, at 9:00 a.m. (Prevailing Eastern Time).

Location of Hearing: Honorable Robyn L. Moberly, U.S. Bankruptcy Judge
Courtroom 329
U.S. Bankruptcy Court for the Southern District of Indiana
46 East Ohio Street
Indianapolis, IN 46204

Copies of Documents: Copies of all documents filed in this chapter 11 case may be accessed through the case website at: <https://omniagentsolutions.com/usagymnastics>, or by contacting the Debtor's attorneys, on PACER, or from the Clerk of the Court.

Call-In Number For Hearing: A dial-in telephone number for interested parties to listen to the hearing, but not actively participate, is 1-888-273-3658, passcode: 9247462#.

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 1099 N. Meridian St., Suite 800, Indianapolis, Indiana 46204.

A. CONTESTED MATTERS

1. Plan Confirmation: *Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1655].

a. Status: This matter is going forward.

b. Confirmation Declarations & Related Documents:

- i. Nownes-Whitaker Declaration:** *Declaration Of Catherine Nownes-Whitaker Regarding The Solicitation Of Votes And Tabulation Of Ballots Cast On The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants' Committee Of Sexual Abuse Survivors* [Dkt. 1732].
- ii. Schneider Declaration:** *Declaration Of Christopher J. Schneider In Support Of Confirmation Of The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt 1752].
- iii. Barron Declaration:** *Declaration Of Bernadette M. Barron In Support Of Confirmation Of The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt 1753].
- iv. Turner Declaration:** *Declaration Of Lauryrn Turner In Support Of Confirmation Of The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt 1754].
- v. Leung Declaration:** *Declaration Of Li Li Leung In Support Of Confirmation Of The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1755].
- vi. Notice Of Partial Settlement Option Deadline Extension:** *Fourth Notice Of Extension Of Deadline For Partial Settlement Option Election Under Third Amended Joint Chapter 11 Plan Of Reorganization* [Dkt. 1758].

c. Objections & Responses:

- i. **UST's Limited Confirmation Objection:** *U.S. Trustee's Limited Objection To Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1734].
- ii. **LIU's Limited Confirmation Objection:** *Limited Objection Of Liberty Insurance Underwriters Inc. To Confirmation Of Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1735].
- iii. **TIG's Confirmation Objection:** *Objection Of TIG Insurance Company To Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1736].
- iv. **Indiana Attorney General's Limited Confirmation Objection:** *State Of Indiana's Limited Objection To The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1739].
- v. **Twistars' Limited Response:** *Limited Response And Reservation Of Rights To The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1728].
- vi. **Great American, NCC, & Virginia Surety's Joint Reservation of Rights:** *Limited Response And Reservation Of Rights To The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1759].

d. Replies:

- i. **USAG's Confirmation Brief & Omnibus Reply:** *Debtor's Memorandum Of Law In Support Of Confirmation Of The Third Amended Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors And Omnibus Reply To Confirmation Objections* [Dkt. 1751].
- ii. **Survivors' Committee's Reply:** *Omnibus Reply Of The Additional Tort Claimants Committee Of Sexual Abuse Survivors In Support Of The Third Amended Joint Chapter 11 Plan Of Reorganization* [Dkt. 1756].

- iii. **USOPC's Reply:** *Response Of The United States Olympic And Paralympic Committee To The United States Trustee's Objection To Third Amended Joint Chapter 11 Plan Of Reorganization* [Dkt. 1757].

Dated: December 12, 2021

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Catherine Steege

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